

**TEXAS RSA 15B2 LIMITED PARTNERSHIP  
D/B/A FIVE STAR WIRELESS  
955 Water Street  
P.O.Box 291158  
Kerrville, Texas 78029-1158**

Magalie Roman Salas, Secretary  
Office of the Secretary  
445 - 12th Street, S.W.  
Washington, D.C. 20554

**Attention: Patrick Forster, Senior Engineer  
Room 3-A104  
Policy Division  
Wireless Telecommunications Bureau**

**Re: Implementation Plan of Wireless E-911 Phase II  
Automatic Location Identification  
Notice Pertaining to CC Docket No. 94-102**

**UPDATED E-911 PHASE II STATUS REPORT**

Dear Ms. Salas:

In accordance with Section 20.18(i) of the Commission's Rules and the Commission's related Public Notice, Mimeo DA 00-2099, released September 14, 2000, we hereby submit our updated report on the status of implementation plans for Wireless E-911 Phase II Automatic Location Information ("ALI"). This report replaces the "E-911 Phase II Status Report" filed with the Commission on November 9, 2000.

The current report is as follows:

**Background/Contact Information**

**1) Carrier Identifying Information:**

Texas RSA 15B2 Limited Partnership d/b/a Five Star Wireless  
TRS Number: 803658

**2) Contact Information:**

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### **E-911 Phase II Location Technology Information**

1) **Type of Technology:** In our original "E-911 Phase II Status Report," filed November 9, 2000, we stated our intention to deploy a network-based solution for the implementation of E-911 Phase II service throughout our single market (consisting of Kerr, Kimble, Gillespie and Kendall Counties in Southwest Central Texas). We hereby notify the Commission that we have changed to a handset-based E-911 Phase II solution.

We have overbuilt our Time Division Multiple Access ("TDMA") digital wireless and analog cellular facilities with a new Code Division Multiple Access ("CDMA") system, and are currently in the process of migrating all of the customers to the CDMA facilities. All of our base station and switching equipment (analog, TDMA and CDMA) is manufactured by Lucent Technologies ("Lucent"). Once the migration of the TDMA and analog customers to CDMA has been accomplished, the TDMA facilities will be deactivated. To date, approximately ten to fifteen percent of our customers have been transferred to the CDMA facilities. The new handsets are a mix of CDMA-only and dual mode CDMA/analog.

The CDMA facilities are E-911 Phase II compliant for the handset-based solution that we have elected to employ. Our E-911 database service provider is Intrado.

We have no plans to upgrade the TDMA facilities (which are being phased out) for E-911 Phase II capability. TDMA is becoming, or has become, an obsolete technology, and Lucent has advised us that it has no plans to develop E-911 equipment and software for TDMA facilities.

As required by Section 22.901(b) of the Commission's Rules, we will retain analog transmission capacity in our system until at least February 18, 2008 to continue to provide analog service in accordance with the requirements set forth in the regulation.

2) **Testing and Verification:** Testing will be conducted with the relevant Public Safety Answering Points ("PSAPs") once a request for E-911 Phase II service has been received. At present, it does not appear that such testing can be performed since the PSAPs in our service area are not equipped to receive and process the E-911 Phase II Automatic Location Information ("ALI") data elements.

3) **Implementation Details and Schedule:** As noted in Item 1, above, we have now

elected to employ a handset-based E-911 Phase II solution; and our CDMA facilities are E-911 Phase II compliant. In addition, 100% of all new handset activations are E-911 Phase II ALI capable.

4) **PSAP Interface:** The PSAPs in our service area are identified as follows: a) Kerr County, Texas – Kerrville Police Department (which currently forwards E-911 calls to the Kerr County Sheriff's Department for emergencies located outside the City of Kerrville; b) Kimble County, Texas – Kimble County Sheriff's Department; c) Gillespie County, Texas – Gillespie County Sheriff's Department; and d) Kendall County, Texas – Kendall County Sheriff's Department.

Our four-county service area is served by three 911 routing tandem switches, four PSAPs, and three 911 providers. Essentially, each county has its own operating entity. The most populous county, Kerr County, has its own independent 911 district, which has not yet requested Phase I implementation. The other three counties operate through area Councils of Governments in conjunction with the State Commission on Emergency Communications ("SCEC"). The implementation for these three counties will be the same, and should not require major network additions beyond those already in place for Phase I. As to Kerr County, what will be required is unknown at present. However, should Kerr County elect to participate in the state SCEC database network, Phase II implementation would be similar to the other three counties.

5) **Existing Handsets:** One hundred percent of all new handset activations are E-911 Phase II ALI-capable. Customers with non-ALI capable handsets (who currently receive analog and/or TDMA service) are receiving ALI-capable ones as they transfer to the CDMA facilities.

6) **Location of Non-Compatible Handsets:** Roamers from other Frequency Block B cellular systems using the CDMA air interface should be able to receive E-911 Phase II service over our CDMA facilities.

With respect to roamers from another CDMA Frequency Block B cellular system using either an incompatible handset-based E-911 Phase II ALI solution or a network-based E-911 solution, we will employ a "best practices" model. First, to the extent that the PSAPs in our service area retain the ability to process Phase I data elements, these roamers should be able to receive Phase I service. Second, these roamers would also be able to receive basic 911 service. Roamers using a TDMA or GSM air interface would not be able to roam on our system.

The Commission has recognized that certain roamers may not have ALI-capable handsets (such as roamers from home systems which have adopted an E-911 Phase II network-based solution), and that interoperability constraints may prevent handset-based roamers from receiving service over a given system resulting, for example, from the use of incompatible handset-based technologies. See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems (CC Docket No. 94-102, Third Report and Order), 14 FCC Rcd. 17388, Para. Nos. 55 – 61 (1999) ("Third R&O"). Accordingly, the Commission has mandated a "best practices" standard in providing E-911 service to certain roamers, but has indicated that the

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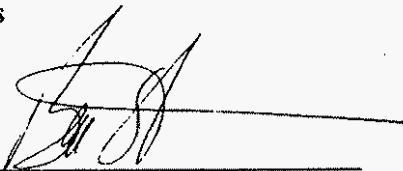
need for the "best practices" model should be of limited duration due to anticipated improvements in technology. Third R&O, Para. Nos. 58 and 61. We believe that the best practices that we have adopted will meet the Commission's requirements. Nevertheless, we will supplement these best practices if it proves necessary and if it is technically feasible to do so.

7) **Other Information**: At present, we provide E-911 Phase I service to all PSAPs in our service area, with the exception of the Kerr County PSAP (which has not requested Phase I service). Upon information and belief, the Kerr County PSAP intends to bypass Phase I and proceed directly to Phase II. To date, we have received no PSAP requests for E-911 Phase II ALI service.

Respectfully submitted,

**Texas RSA 15B2 Limited  
Partnership d/b/a Five Star  
Wireless**

Dated: 9/9/2005

By:   
W.G. (Bill) Stacy, General Manager